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5 *Attorneys for Lead Plaintiff*
6 *Bluefin Capital Management, LLC*

7 [Additional Counsel on Signature Page.]

8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10
11 ERIC WHITE, Individually and on
12 Behalf of All Others Similarly
Situating,

13 Plaintiff,

14
15 v.

16 BROOGE ENERGY LIMITED, et al.,

17 Defendants.
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Case No.: 2:24-cv-00959-AH-DFM

**APPLICATION FOR ENTRY OF
DEFAULT AGAINST NICOLAAS L.
PAARDENKOOPEL AND LINA
SAHEB FOR NONRESPONSE TO
SECOND AMENDED COMPLAINT**

1 To the Clerk of the United States District Court for the Central District of
2 California:

3 Plaintiff Bluefin Capital Management, LLC (“Plaintiff”) hereby respectfully
4 applies to this Court, pursuant to Federal Rule of Civil Procedure 55, for the Entry
5 of Default against Defendants Nicolaas L. Paardenkooper (“Paardenkooper”) and
6 Lina Saheb (“Saheb” and, collectively with Paardenkooper, the “Nonresponsive
7 Defendants”) for failure to respond to the Second Amended Complaint (“SAC”)
8 within the time prescribed by the Federal Rules of Civil Procedure and the Local
9 Rules of this Court, and requests that the Clerk enter the default of the Nonresponsive
10 Defendants for failure to respond to the SAC in a timely manner.

11 The Nonresponsive Defendants were served on July 12, 2025
12 (Paardenkooper) and July 13, 2025 (Saheb) with a true and correct copy of the SAC.
13 The Certificates of Service, which were filed with this Court on July 17, 2025 (ECF
14 No. 107; Paardenkooper) and July 31, 2025 (ECF No. 112; Saheb), serve as proof
15 of proper service under Federal Rule of Civil Procedure 4(f)(2). *See* Exhibits 1 and
16 2, respectively.¹ The deadline for the Nonresponsive Defendants to appear or
17 otherwise respond to the SAC expired on August 4, 2025 under Federal Rule of Civil
18 Procedure 12(a)(1)(A(i). The Nonresponsive Defendants failed to plead or
19 otherwise respond to the SAC by the deadline.

20 This request is based on the Declaration of Cornelia J. B. Gordon in Support
21 of Application for Entry of Default filed concurrently herewith.

22 Based on the foregoing, Plaintiff respectfully requests that the Clerk of the
23 Court enter default against the Nonresponsive Defendants.

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26 _____
27 ¹ “Exhibits” refers to exhibits to the Declaration of Cornelia J. B. Gordon filed
28 concurrently with this Application.

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2 DATED: October 31, 2025

Respectfully submitted,

3 **SCOTT+SCOTT ATTORNEYS AT LAW LLP**

4 *s/ Amanda F. Lawrence*

5 *Amanda F. Lawrence (admitted pro hac vice)*

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*Attorneys for Lead Plaintiff Bluefin Capital
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CERTIFICATE OF COMPLIANCE

The undersigned counsel of record for Lead Plaintiff Bluefin Capital Management, LLC, certifies that this Application for Entry of Default for Nonresponse to Second Amended Complaint is one page in length and complies with the 25-page limit of this Court's Standing Order, ¶ F(3), dated December 17, 2024, docketed in this action as ECF No. 48.

DATED: October 31, 2025

s/ Amanda F. Lawrence
Amanda F. Lawrence

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2025, I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of this filing via electronic means to all counsel of record.

DATED: October 31, 2025

s/ Amanda F. Lawrence

Amanda F. Lawrence